



April 17, 2023

Re: *Request for Comments*, Development of a National Spectrum Strategy

Docket/RM: NTIA-2023-0003

The National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (National ACE) would like to provide a comment in response to the National Telecommunications and Information Administration (NTIA) request on its development of a national spectrum strategy.

As the unified voice of 2.65 million Asian American and Pacific Islander (AAPI) small business owners in the United States—who employ 5.1 million people and represent a buying power of \$1.3 trillion—we would like to emphasize the importance of access to reliable, high-performance, and cost-efficient spectrum for small business owners in an increasingly digital world.

During pandemic lockdowns in 2020 and 2021, digital connectivity often made the difference between which businesses were able to survive and which ones had to close operations. In the modern economy, access to capital and technology are intertwined. From broadband connectivity and quality, to e-commerce and digital literacy, AAPI small businesses must be fully incorporated into the digital economy in order to remain competitive and access the capital and resources necessary to start, retain, and grow their businesses.

Today, we know that connectivity is crucial for small to medium business (SMB) owners to run their operations, manage orders in-person and virtually, track supply chains, participate in smart manufacturing, and maintain a website, for example. Wireless connectivity is going to be crucial to every step of business in the next decade, to not only keep things running smoothly but also to avert a crisis during unforeseeable events, like supply chain disruptions. As such, there needs to be certainty that the networks provided will be able to perform reliably.

Since a significant part of business operations rely on mobile devices for wireless connectivity, we urge the NTIA to consider the importance of continuing investments in licensed spectrum. Though we recognize the need for both licensed and unlicensed, it is a fact that our most disadvantaged entrepreneurs—who often live in old structures that cannot even have fiber laid in the walls for broadband—rely on their mobile wireless connections through data, apps, devices, and services, to run their day-to-day operations and ensure they can securely support themselves and their families.

In conclusion, we urge the NTIA to adopt a balanced spectrum policy that continues investments in licensed spectrum, which is crucial for the operations, success, and streamlining of AAPI business.

Sincerely,

The National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship